

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

MICHAEL BLAIR and DENISE BLAIR, et al.)	
)	
Plaintiffs,)	
vs.)	CASE: 5:08-cv-00360-M
)	
UNION PACIFIC RAILROAD COMPANY,)	
a Delaware corporation,)	
)	
Defendant.)	

PLAINTIFFS' WITNESS LIST

NAME	ADDRESS	EXPECTED TESTIMONY
Michael Blair	c/o Plaintiffs' counsel	The inundation of plaintiffs' property by floodwater on or about August 19, 2007; the damages to plaintiffs' real and personal property; the physical, personal, emotional, and economic damages sustained by plaintiffs'; the value of plaintiffs' property as detailed on reports prepared by plaintiffs' experts.
Denise Blair	c/o Plaintiffs' counsel	Same as above
Gary Bengs	c/o Plaintiffs' counsel	Same as above
Kelly Bengs	c/o Plaintiffs' counsel	Same as above
Barry Bollenbach	c/o Plaintiffs' counsel	Same as above
Joyce Bollenbach	c/o Plaintiffs' counsel	Same as above
Shirlene Boutwell	c/o Plaintiffs' counsel	Same as above
Randy Boeckman	c/o Plaintiffs' counsel	Same as above
Brent Henderson	c/o Plaintiffs' counsel	Same as above
Randy Briscoe	c/o Plaintiffs' counsel	Same as above
Jesus Camarena	c/o Plaintiffs' counsel	Same as above
Danny Cantrell	c/o Plaintiffs' counsel	Same as above
Debra Cantrell	c/o Plaintiffs' counsel	Same as above
George Christian	c/o Plaintiffs' counsel	Same as above
LaWanna Christian	c/o Plaintiffs' counsel	Same as above
Kevin Kale	c/o Plaintiffs' counsel	Same as above
Richard Cofer	c/o Plaintiffs' counsel	Same as above
Earlene Cofer	c/o Plaintiffs' counsel	Same as above
William Cope	c/o Plaintiffs' counsel	Same as above
Kathy Cope	c/o Plaintiffs' counsel	Same as above
Frances Thiems	c/o Plaintiffs' counsel	Same as above
Carol Shilling	c/o Plaintiffs' counsel	Same as above
Alfredo Delgadillo	c/o Plaintiffs' counsel	Same as above

Jan Denny	c/o Plaintiffs' counsel	Same as above
Ricky Jacobs	c/o Plaintiffs' counsel	Same as above
Rena Frair	c/o Plaintiffs' counsel	Same as above
Carol Franklin	c/o Plaintiffs' counsel	Same as above
Charles Free	c/o Plaintiffs' counsel	Same as above
Gracie Free	c/o Plaintiffs' counsel	Same as above
Kane Free	c/o Plaintiffs' counsel	Same as above
Margarita Free	c/o Plaintiffs' counsel	Same as above
Ricky Garner	c/o Plaintiffs' counsel	Same as above
Anna Garner	c/o Plaintiffs' counsel	Same as above
Don George	c/o Plaintiffs' counsel	Same as above
Wilma George	c/o Plaintiffs' counsel	Same as above
Wendell Prim	c/o Plaintiffs' counsel	Same as above
John Gooden	c/o Plaintiffs' counsel	Same as above
Gerald Harper	c/o Plaintiffs' counsel	Same as above
Barbara Harper	c/o Plaintiffs' counsel	Same as above
Danny Henry	c/o Plaintiffs' counsel	Same as above
Marla Henry	c/o Plaintiffs' counsel	Same as above
Gail Hill	c/o Plaintiffs' counsel	Same as above
Matthew Huckins	c/o Plaintiffs' counsel	Same as above
Gerald Jobe	c/o Plaintiffs' counsel	Same as above
Larry Adams	c/o Plaintiffs' counsel	Same as above
Tonya Raymond	c/o Plaintiffs' counsel	Same as above
Lawrence Kraus	c/o Plaintiffs' counsel	Same as above
Linda Kraus	c/o Plaintiffs' counsel	Same as above
Claude Lann	c/o Plaintiffs' counsel	Same as above
Ray Lindsey	c/o Plaintiffs' counsel	Same as above
Robert Lindsey	c/o Plaintiffs' counsel	Same as above
Mary Lindsey	c/o Plaintiffs' counsel	Same as above
Steve Markus	c/o Plaintiffs' counsel	Same as above
Vida Markus	c/o Plaintiffs' counsel	Same as above
Donna Moreno	c/o Plaintiffs' counsel	Same as above
Chuck Palmer	c/o Plaintiffs' counsel	Same as above
Jose Munoz	c/o Plaintiffs' counsel	Same as above
Donald Murray	c/o Plaintiffs' counsel	Same as above
Jack Musick	c/o Plaintiffs' counsel	Same as above
Charles Norbury	c/o Plaintiffs' counsel	Same as above
Marla Ogilvie	c/o Plaintiffs' counsel	Same as above
Carmen Ortega	c/o Plaintiffs' counsel	Same as above
Bernard Padilla	c/o Plaintiffs' counsel	Same as above
Genaro Padilla	c/o Plaintiffs' counsel	Same as above
Servando Padilla	c/o Plaintiffs' counsel	Same as above
Chris Palmer	c/o Plaintiffs' counsel	Same as above
Elnora Yarbrough	c/o Plaintiffs' counsel	Same as above
Michelle Clayton	c/o Plaintiffs' counsel	Same as above

Jimmy Pirtle	c/o Plaintiffs' counsel	Same as above
Connie Pirtle	c/o Plaintiffs' counsel	Same as above
Jerry Pittman	c/o Plaintiffs' counsel	Same as above
Theresa Pittman	c/o Plaintiffs' counsel	Same as above
Jack Pogue	c/o Plaintiffs' counsel	Same as above
Beverly Pogue	c/o Plaintiffs' counsel	Same as above
Daniel Baustert	c/o Plaintiffs' counsel	Same as above
Shelley Blair	c/o Plaintiffs' counsel	Same as above
Joyce Stuteville	c/o Plaintiffs' counsel	Same as above
Richard Reynolds	c/o Plaintiffs' counsel	Same as above
Boyd Ransom	c/o Plaintiffs' counsel	Same as above
Johnnie Ruhl	c/o Plaintiffs' counsel	Same as above
Jerry Standefur	c/o Plaintiffs' counsel	Same as above
Thomas Standefur	c/o Plaintiffs' counsel	Same as above
Deborah Sanders	c/o Plaintiffs' counsel	Same as above
Jack Stuteville	c/o Plaintiffs' counsel	Same as above
Walter Vickman	c/o Plaintiffs' counsel	Same as above
Bonita Vickman	c/o Plaintiffs' counsel	Same as above
Debra Waeger	c/o Plaintiffs' counsel	Same as above
Terry Wallace	c/o Plaintiffs' counsel	Same as above
Brian Walter	c/o Plaintiffs' counsel	Same as above
Larry Wilson	c/o Plaintiffs' counsel	Same as above
Kennetha Wilson	c/o Plaintiffs' counsel	Same as above
Blaine T. Reely, PhD, PE	Monsoon Consultants P O Box 3167 Enid OK 73702	Flooding in Kingfisher County and the effect of Defendant's bridges, culverts, embankment and track on flooding in Kingfisher County
William M. Clark, PhD	1830 Coventry Lane Oklahoma City, OK 73120	Information regarding the financial condition of Defendant and opinions concerning potential punitive damages
Gary Miles	Casualty Consultants Gary Miles, P.A. #8 Fawn Lane Ponca City, OK 74604	Plaintiffs' personal property damaged or lost due to the 2007 flood and the cost to repair or replace the property; methodologies used to determine replacement and/or repair of personal property.
Preston Lay	Brendle & Company 7110 E. Alameda Norman, OK 73070	Plaintiffs' real property damaged in the 2007 flood and the cost to repair the property; methodologies used to calculate construction estimates and costs
Mike Miller	Miller Appraisal Services, LLC 541 Skyridge Trail Noble, OK 73068	The value of plaintiffs' real property at the time of the flood; methodologies used to determine property values and prepare property appraisals
Finley Porterfield	Porterfield Surveying 1104 W. Poplar Ave. Enid, OK 73703	Surveys conducted in Kingfisher County, Oklahoma between September 2007 and February 2009; survey techniques and methodology
Tim Jones	114 N. 8 th	Water levels of Kingfisher Creek at bridge 377.8 on

	Kingfisher, OK	04/10/08
Randy Poindexter	City of Kingfisher 301 N. Main Kingfisher OK 73750	Conditions in Kingfisher and Kingfisher County during and after the 2007 flood; search and rescue efforts; affects on residents and property.
Richard Reynolds	Same as above	City of Kingfisher's contacts with Defendant regarding Defendant's real property in the city of Kingfisher; efforts taken by the city to clean bridges, drainage structures and culverts after the 2007 flood
Steve Loftis	Same as above	2007 flood and its effect on the city of Kingfisher and its residents; emergency efforts taken by the city and county
Vince Hernandez	Executive Director American Red Cross 601 NE 6 th St Oklahoma City OK 73104	Role of the American Red Cross in responding to disasters; staffing for the 2007 Kingfisher flood
John Starr	American Red Cross 601 NE 6 th St Oklahoma City OK 73104	Conditions in Kingfisher following the 2007 flood; numbers and condition of residents applying for aid; services provided by Red Cross
Kathleen Hawkins	301 Vinnedge Blackwell OK	Work done by the American Red Cross during floods; affects of floods on residents and their property; dangers associated with floods
Danny Francis	Francis Enterprises Rt 2 Box 83 Kingfisher OK 73750	Condition of Kingfisher Creek in the area of Bridge 377.8 following the 2007 flood; condition of UP drains and culverts in Kingfisher OK following the flood; work performed by Francis Enterprises for City of Kingfisher following the 2007 flood.
Chris Vokt	Olsson Associates Omaha, Nebraska	Replacement Structure Recommendation Form dated 4/11/08 re: Culvert 378.75, and all studies, reports and other work associated with or referenced therein; knowledge of UPRR's 50 and 100 year standard hydraulic criteria
Joe Lileikis	9103 Balcones Club Austin, TX 78750	10/04/89 Town Hall meeting in Kingfisher and topics discussed in meeting; 10/06/89 memorandum re: meeting; actions taken by UP re: conditions discussed in meeting; UP policies and procedures.
Unidentified UP employees, past and present	Unknown at this time	Because the depositions of UP employees have not been completed, the exact testimony of UP employees is not known at this time. It is expected that the following employees, and other employees yet to be identified, will testify regarding UP policies and procedures on the design, construction, inspection, and maintenance of bridges, culverts, and tracks; maintenance-of-way rules; environmental policies; company, industry, and federal railway standards and regulations; design, construction, and maintenance of structures in Kingfisher County.

David Adams	UP	Formerly Manager Bridge Maintenance and Director Bridge Maintenance – retired (named in culvert replacement form)
Mike Bruckner	UP	Senior Manager Structural Design (named in culvert replacement form)
Dave Griffin	UP	General Director of Maintenance & Way – Track Program
Tom Romero	UP	Manager Track Maintenance
Dale Kreifels	UP	Director Track Maintenance
Gary Rethman	UP	Formerly Manager Track Projects; currently Director Track Projects
Bennie Joe Tull	UP	Bridge Supervisor
Clay McManaman	UP	Manager Track Maintenance
Matt Hubbard	UP	Maintenance of Way Inspector
Tim Finnigan	UP	Maintenance of Way Inspector
Gary Gott	UP	Senior Claims Manager
Dan Miller	UP	Formerly Director Track Maintenance; currently Manager of Special Projects Industry and Public Projects
Dale Pecaut	UP	Director Track Maintenance – retired
P. E. Jacquinet	UP	Maintenance Engineer Track – retired
Mike Patchett	UP	Formerly Manager Bridge Maintenance; currently Manager Bridge Construction
John Horney	UP	Formerly Bridge Engineer, Construction Engineer Bridges – retired
Jerry Butler	UP	Formerly Director Bridge Maintenance; currently Director Bridge Construction
Tomasz Gawronski	UP	Director Bridge Maintenance
Eric Epps	UP	Manager Bridge Maintenance
J. R. Beran	UP	Chief Engineer Design – retired
Gene Groves	UP	Formerly Engineer Structures, Construction Engineer Structures, and Maintenance Engineer Structures – retired
Donald Steele	UP	Formerly Manager Structures, Manager Project Design, and Manager Bridge Construction – retired
Brennan Bannion	UP	Chief Engineer
Jerry Rugg	UP	Chief Engineer – retired
Ronnie Taylor	UP	Section Foreman
William L. Hammond	UP	Formerly Senior Structure Designer; currently Manager of Environmental Field Operations.
Darrell Deterding	UP	Director of Structural Design – retired
Charles Felkins	UP	Engineering and Project Manager

Respectfully submitted,

s/Bradley A. Gungoll

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Attorneys for Plaintiffs

CERTIFICATE OF DELIVERY

I hereby certify that on the 2nd day of April, 2009, a true and correct copy of the foregoing document was sent to the following parties via facsimile, email, and/or postage-prepaid First Class mail:

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s/Bradley A. Gungoll